

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

BARCO, INC. and BARCO NV,

Plaintiffs,

v.

YEALINK (USA) NETWORK
TECHNOLOGY CO., LTD., and
YEALINK NETWORK
TECHNOLOGY CO., LTD.

Defendants.

Case No. 2:23-CV-00521-JRG-RSP

**DECLARATION OF ERIK J. HALVERSON IN SUPPORT OF
PLAINTIFFS' OPENING CLAIM CONSTRUCTION BRIEF**

I, Erik J. Halverson, hereby declare as follows:

1. I am a partner at the law firm of K&L Gates LLP and counsel for Plaintiffs Barco, Inc. and Barco NV (collectively, "Plaintiffs"). I have personal knowledge of the facts set forth in this Declaration and if called upon as a witness, I could and would testify to such facts under oath.

2. Attached as **Exhibit A** is a true and correct copy of U.S. Patent No. 10,762,002 (the "'002 Patent"), one of the asserted patents in this action.

3. Attached as **Exhibit B** is a true and correct copy of U.S. Patent No. 10,795,832 (the "'832 Patent"), one of the asserted patents in this action.

4. Attached as **Exhibit C** is a true and correct copy of U.S. Patent No. 10,904,103 (the "'103 Patent"), one of the asserted patents in this action.

5. Attached as **Exhibit D** is a true and correct copy of U.S. Patent No. 11,258,676 (the "'676 Patent"), one of the asserted patents in this action.

6. Attached as **Exhibit E** is a true and correct copy of U.S. Patent No. 11,403,237 (the “237 Patent”), one of the asserted patents in this action.

7. Attached as **Exhibit F** is a true and correct copy of U.S. Patent No. 11,422,951 (the “951 Patent”), one of the asserted patents in this action.

8. Attached as **Exhibit G** is a true and correct copy of the prosecution history of U.S. Patent No. 10,904,103.

9. Attached as **Exhibit H** is a true and correct copy of the prosecution history of U.S. Patent No. 11,403,237.

10. Attached as **Exhibit I** is a true and correct copy of the Expert Declaration of Michael C. Brogioli, Ph.D. regarding Claim Construction.

11. Attached as **Exhibit J** is a true and correct copy of the transcript of the deposition of Michael C. Brogioli, Ph.D., held on January 17, 2025.

12. Attached as **Exhibit K** is a true and correct copy of the Declaration of Kevin C. Almeroth, Ph.D. regarding Claim Construction.

13. Attached as **Exhibit L** is a true and correct copy of the transcript of the deposition of Kevin Almeroth, Ph.D., held on January 9, 2025.

14. Attached as **Exhibit M** is a true and correct copy of the Declaration of Kevin C. Almeroth, Ph.D. in support of Yealink’s Petition for *Inter Partes* Review of U.S. Patent No. 10,762,002, submitted in IPR2024-01436.

15. Attached as **Exhibit N** is a true and correct copy of Yealink’s WPP30 Data Sheet.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on January 28, 2025 in San Francisco, CA.

/s/ Erik J. Halverson
Erik J. Halverson